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12 Attorneys for Creditor
13 CHURCH OF SCIENTOLOGY INTERNATIONAL

14 UNITED STATES BANKRUPTCY COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16	In re)	CASE NO. 95-10911 aj
17)	
18)	CHURCH OF SCIENTOLOGY
19)	INTERNATIONAL'S EMERGENCY
20)	MOTION TO SEAL VOLUMES I
21)	AND VI OF GERALD
22)	ARMSTRONG'S EVIDENCE IN
23)	SUPPORT OF MOTION FOR
24	GERALD ARMSTRONG,)	RELIEF FROM STAY
25)	
26)	
27)	DATE: May 18, 1995
28)	TIME: 9:00 a.m.
	Debtor)	CTRM: Hon. Alan
)	Jaroslovsky
)	

1 TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that creditor Church of Scientology
3 International ("the Church") will and hereby does move, this Court,
4 (1) for an order sealing Volumes I and VI of the evidence filed by
5 the debtor Gerald Armstrong ("Armstrong") in opposition to the
6 Church's motion for relief from stay until the Church's motion to
7 strike that evidence may be heard and decided, and (2) for an order
8 shortening time on the Church's motion (currently in preparation)
9 to strike that evidence.

10 As grounds for this emergency motion, the Church states:

11 1. In opposition to the Church's motion for relief from
12 stay, filed with this Court on April 26, 1995 and set to be heard
13 on May 25, 1995, Armstrong filed two declarations and seven volumes
14 of what he termed "Evidence in Support of Opposition to
15 Scientology's (sic) Motion for Relief From Stay." This "evidence"
16 has nothing to do with the issues presented by the Church's motion
17 for relief, which is a straightforward motion asking the Court to
18 permit the Church to conclude the state court action against
19 Armstrong, which was set to go to trial today. Instead, the
20 "evidence" consists of voluminous declarations, previously filed by
21 Armstrong in other matters, all of which have as their general
22 import his opinion that the Church is "bad;" declarations of other
23 anti-Scientology litigants, also previously filed in other matters,
24 also expressing their opinions that the Church is "bad;" two new
25 declarations insisting that Armstrong is a Christian and, because
26 of his Christianity, has been compelled by God to violate both his
27 settlement agreement with the Church and court orders based on that
28 agreement; and copied and/or altered versions of some of the

1 Church's confidential scripture, which consist of protected trade
2 secrets, and which are the subject of this motion.

3 2. Two of the volumes of evidence filed by Armstrong contain
4 materials which are confidential trade secrets belonging to the
5 Church and which, pursuant to California and federal law, should be
6 sealed from public view; and

7 3. The Church's motion to strike Armstrong's filing, which
8 is currently being prepared, should be heard at the same time as
9 the motion for relief from stay.

10 This application is based this notice of motion, the attached
11 Declaration of Laurie J. Bartilson and exhibits thereto, the
12 accompanying Memorandum of Points and Authorities, and any
13 argument which may properly come before this court.

14 Dated: May 18, 1995

Respectfully submitted,

15 Andrew H. Wilson
16 WILSON, RYAN & CAMPILONGO

17 MOXON & BARTILSON

18 By: Laurie J. Bartilson
19 Laurie J. Bartilson *HL*

20 Attorneys for Plaintiff
21 CHURCH OF SCIENTOLOGY INTERNATIONAL
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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Hollywood, CA 90028.

On May 18, 1995, I served the foregoing document described as CHURCH OF SCIENTOLOGY INTERNATIONAL'S EMERGENCY MOTION TO SEAL VOLUMES I AND VI OF GERALD ARMSTRONG'S EVIDENCE IN SUPPORT OF MOTION FOR RELIEF FROM STAY on interested parties in this action,

[] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [] the original [X] true copies thereof in sealed envelopes addressed as follows:

GERALD ARMSTRONG
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

[X] BY FAX AND MAIL

Jeffry G. Locke, Trustee
P.O. Box 488
Kentfield, CA 94914-0488

[X] BY MAIL

[] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an

affidavit.

Executed on May 18, 1995, at Los Angeles, California.

[] **(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on _____, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Abel E. Demura

Print or Type Name

Abel E. Demura

Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)